Appendix 8

NARRATIVE DESCRIPTION

-

PROCESS FLOW DIAGRAM

-

PLOT PLAN

-

MAP

-

DUST CONTROL PLAN

PROCESS DESCRIPTION NARRATIVE

A full narrative of the Ely Energy Center process, including process descriptions, emissions estimates of regulated air pollutants, and a discussion of applicable requirements, is presented in Sections 1.0 through 4.0 of the "Application for Operating Permit to Construct," which precedes the NDEP application package. Appendix B of the "Application for Operating Permit to Construct" presents the best available control technology (BACT) analysis, and Appendix A9 discusses the air quality impact analysis, including modeling.

Legend

Fence Line Boundary

N
W E
S

0 5

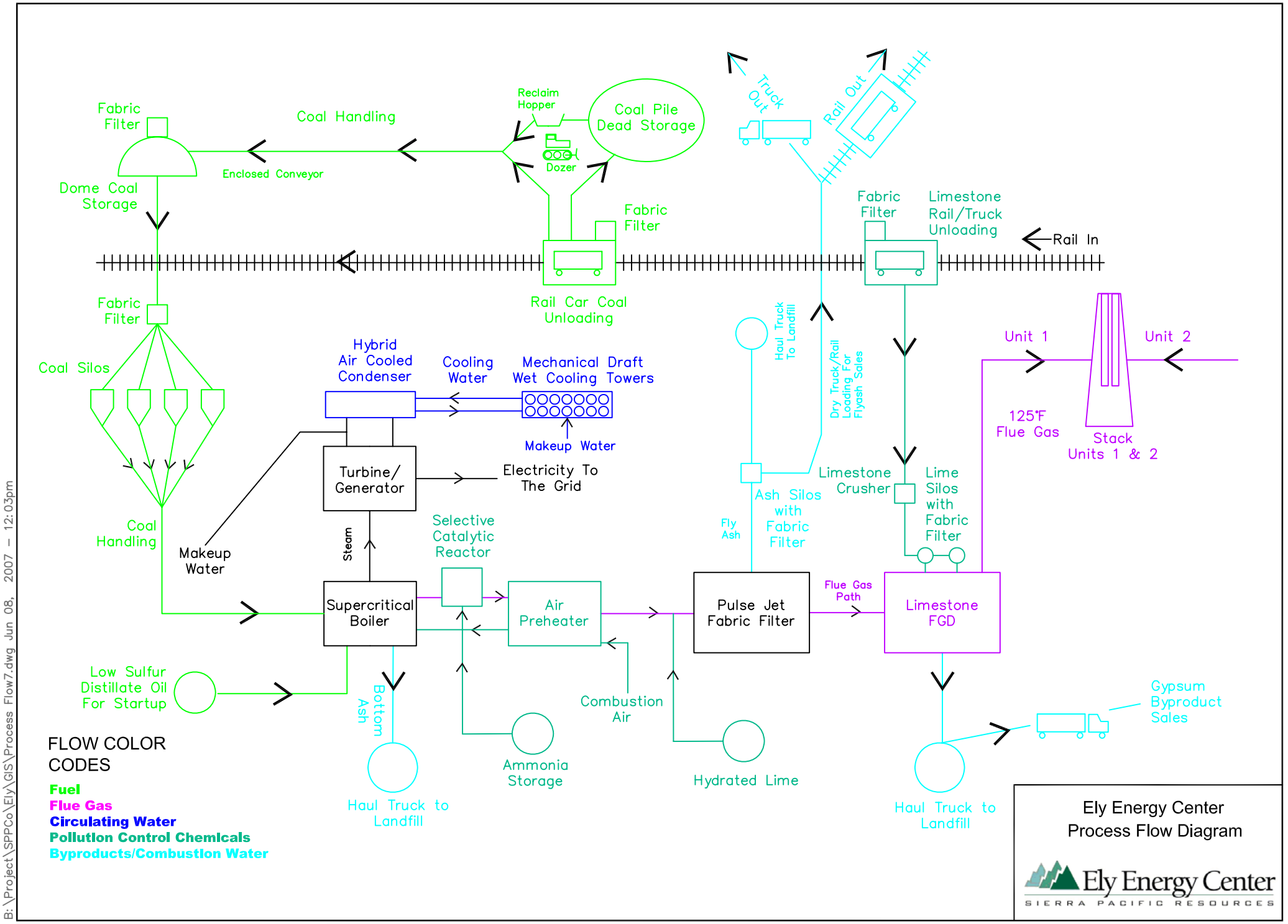
Approximate Scale in Miles

Sierra Pacific RESOURCES

TETRA TECH EM INC.

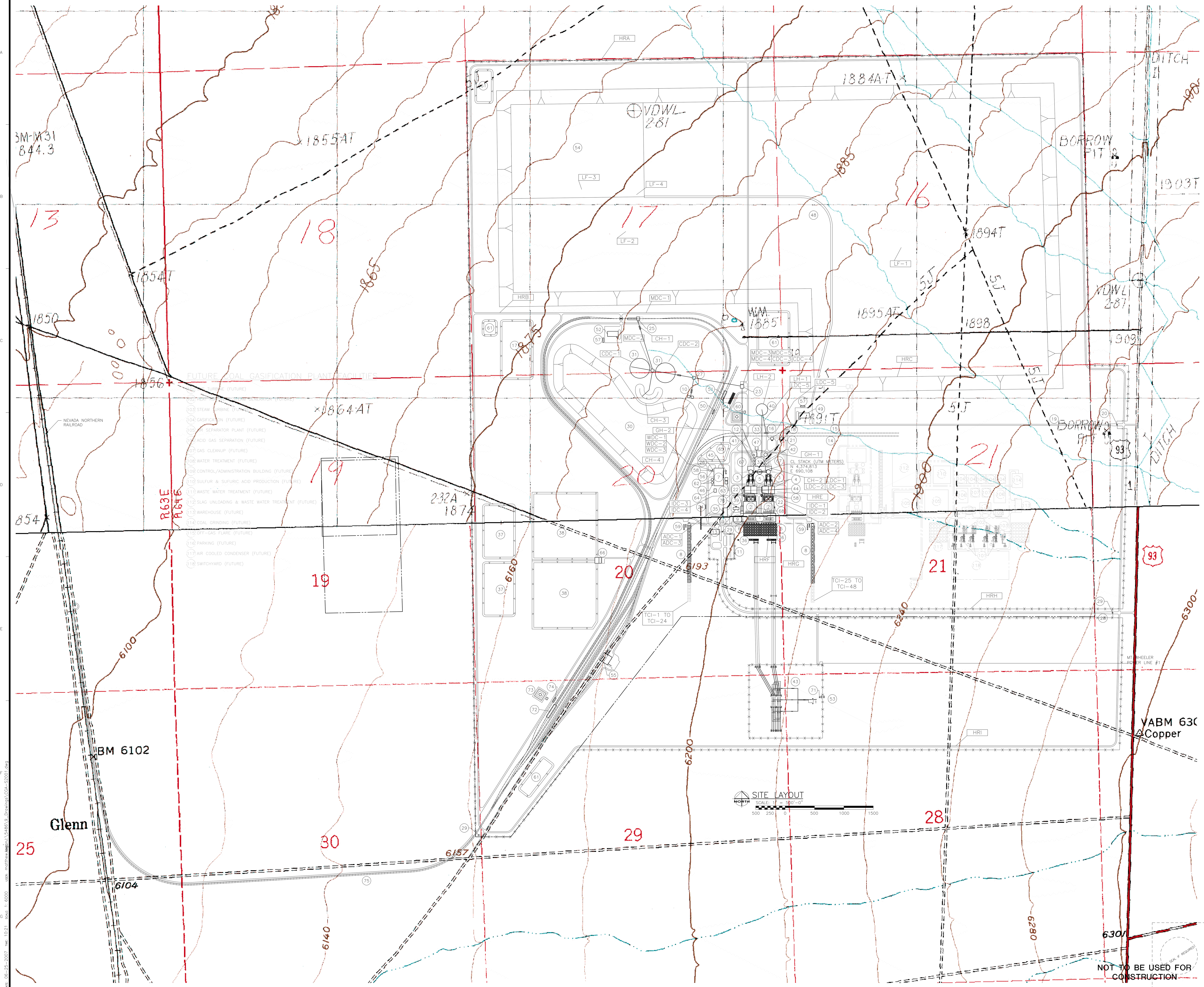
Ely Energy Center
Location Map

2006-09-30 S:\Project\sppco\steptoe\GIS\Location_Map1-1.mxd Bob Farnes



B:\Project\SPPCo\Ely\GIS\Process Flow7.dwg Jun 08, 2007 - 12:03pm

DWG. NO. 5486-CGA-S2001



FACILITIES LEGEND

1. STEAM TURBINE GENERATOR (120')
2. BOILER (280')
3. AQCS WET FGD (120')
4. AQCS FABRIC FILTER (65')
5. STACK (727')
6. CONDENSATE STORAGE TANK (UNDER ACC) (34')
7. WATER/WASTE WATER TREATMENT (32')
8. COOLING TOWER (50')
9. ADMINISTRATION BUILDING (75')
10. EMERGENCY COAL RECLAIM
11. EMPLOYEE PARKING
12. MAKE-UP WATER TANKS (30')
13. WAREHOUSE BUILDING (24')
14. ASH/GYPSUM LOADOUT TRACK
15. LIMESTONE UNLOADING TRACK
16. LIMESTONE UNLOADING (32')
17. COAL PILE RUN-OFF POND
18. FLY ASH SILOS (125')
19. CONSTRUCTION ENTRANCE ROAD
20. CONSTRUCTION GUARD HOUSE (10')
21. ABSORBER HOLD TANK (50')
22. BOTTOM ASH SILO (100')
23. CRUSHER HOUSE (90')
24. TRUCK SCALE
25. ROTARY DUMPER (32')
26. SODA ASH
27. CONVEYOR TRANSFER TOWER #2 (40')
28. PLANT ACCESS ROAD
29. GUARD HOUSE (10')
30. COAL PILE DEAD STORAGE (40')
31. COAL LIVE STORAGE DOME (120')
32. LIMESTONE PREP/GYPSUM DEWATERING BLDG (85')
33. LIMESTONE CONVEYOR
34. AMMONIA STORAGE
35. PLANT MAINTENANCE BUILDING (40')
36. AIR COOLED CONDENSER (120')
37. EVAPORATION POND
38. SERVICE/FIRE WATER STORAGE POND
39. AUXILIARY BOILER
40. LIMESTONE STORAGE (55')
41. RECLAIM WATER TANK (15')
42. LIMESTONE SLURRY TANK (30')
43. SWITCHYARD
44. PAC SILO (70')
45. DEMINERALIZED WATER STORAGE TANK (40')
46. POTABLE WATER STORAGE TANK (15')
47. GYPSUM BUNKER (25')
48. LANDFILL
49. ASH HAUL TRUCK/LIGHT VEHICLE MAINT FACILITY (32')
50. SECONDARY/AUX BOILER DIESEL FUEL LOAD/UNLOAD STA
51. AMMONIA UNLOADING
52. COAL YARD TRUCK MAINTENANCE (32')
53. COMMUNICATION SHELTERS & MICROWAVE TOWER
54. 5-YEAR LANDFILL CELL
55. RAIL CAR OPERATION & MAINTENANCE FACILITY (32')
56. MAGNESIUM HYDROXIDE STORAGE SILO (100')
57. MOBILE EQUIPMENT FUELING
58. HYDRATED LIME STORAGE SILO (70')
59. CIRC WATER CHEM FEED EQUIPMENT
60. SECONDARY/AUX BOILER DIESEL FUEL STORAGE (46')
61. SITE STORM DETENTION POND
62. CLARIFIERS (30')
63. PLANT WASTEWATER SUMP & MAINTENANCE BASIN
64. SANITARY WATER TREATMENT PLANT
65. LIMESTONE/GYPSUM/ASH BASIN
66. SERVICE/FIRE WATER PUMP HOUSE (24')
67. FUTURE CO2 CAPTURE
68. BURNER D2 SUPPLY TANK (15')
69. FIRE BOOSTER PUMPS/STA AIR COMP/STANDBY GEN (24')
70. AUX BOILER/STANDBY GEN D2 SUPPLY TANK (15')
71. SWITCHYARD/COMMUNICATIONS AUXILIARY GENERATOR (10')
72. LOCOMOTIVE FUELING RACK
73. LOCOMOTIVE DIESEL FUEL STORAGE (30')
74. LOCOMOTIVE DIESEL FUEL LOAD/UNLOAD STA
75. INTERCONNECTING RAIL LOOP

REV.	DATE	DESCRIPTION	DWN	ENGR	CHK	APPV
F	12 APR 07	REVISED	TMS	JAC		
E	15 FEB 07	REVISED	TMS	JAC		
D	2 FEB 07	BOILER SPEC – FOR BIDS	TMS	JAC		
C	25 JAN 07	OWNER REVIEW	TMS			
H	26 JUNE 07	INCORPORATED COMMENTS	ELT			
G	25 MAY 07	REVISED	TMS			

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Ely Energy Center
SIERRA PACIFIC RESOURCES

ELY ENERGY CENTER
PRELIMINARY SITE ARRANGEMENT
SOUTH STEPTOE VALLEY SITE

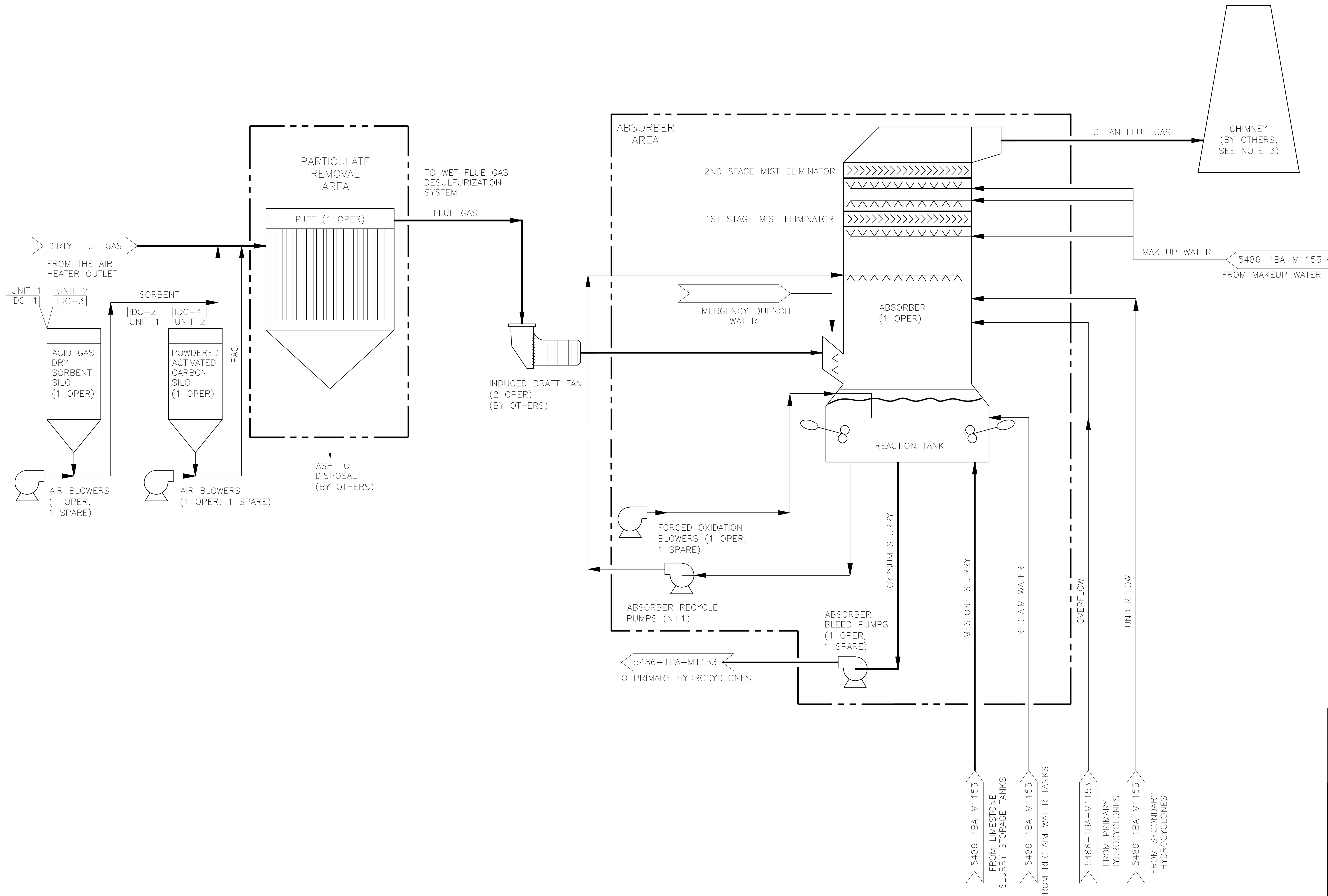
SCALE: 1=500' | PROJECT NO. 5486
DWG. NO. 5486-CGA-S2001 | REV. H

DATE: 06-25-2007 TIME: 10:21 SCALE: 1:6000 USER: matthew.sexton J:\5486\9_Drawings\CGA-S2001.dwg

DWG. NO. 5486-1BA-M1152

NOTES:

1. TYPICAL FLOW DIAGRAM FOR ONE UNIT'S PATH OF SORBENT INJECTION SYSTEMS, PJFF, FLUE GAS DESULFURIZATION SYSTEM.
2. ALL QUANTITIES OF EQUIPMENT ANNOTATED IN PARENTHESES ARE FOR THE AQCS FOR ONE UNIT.
3. THERE IS ONLY ONE CHIMNEY REQUIRED FOR TWO UNITS (1 & 2).
4. FOR A COMPLETE LIST OF SYMBOLS AND ABBREVIATIONS SEE DRAWING M1200



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B	04/13/07	INCORPORATE COMMENTS	NSG			
A	03/09/07	INITIAL ISSUE	ELT			

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FLOW DIAGRAM
AIR QUALITY CONTROL SYSTEM

NOT TO BE USED FOR CONSTRUCTION

SCALE: NONE | PROJECT NO.

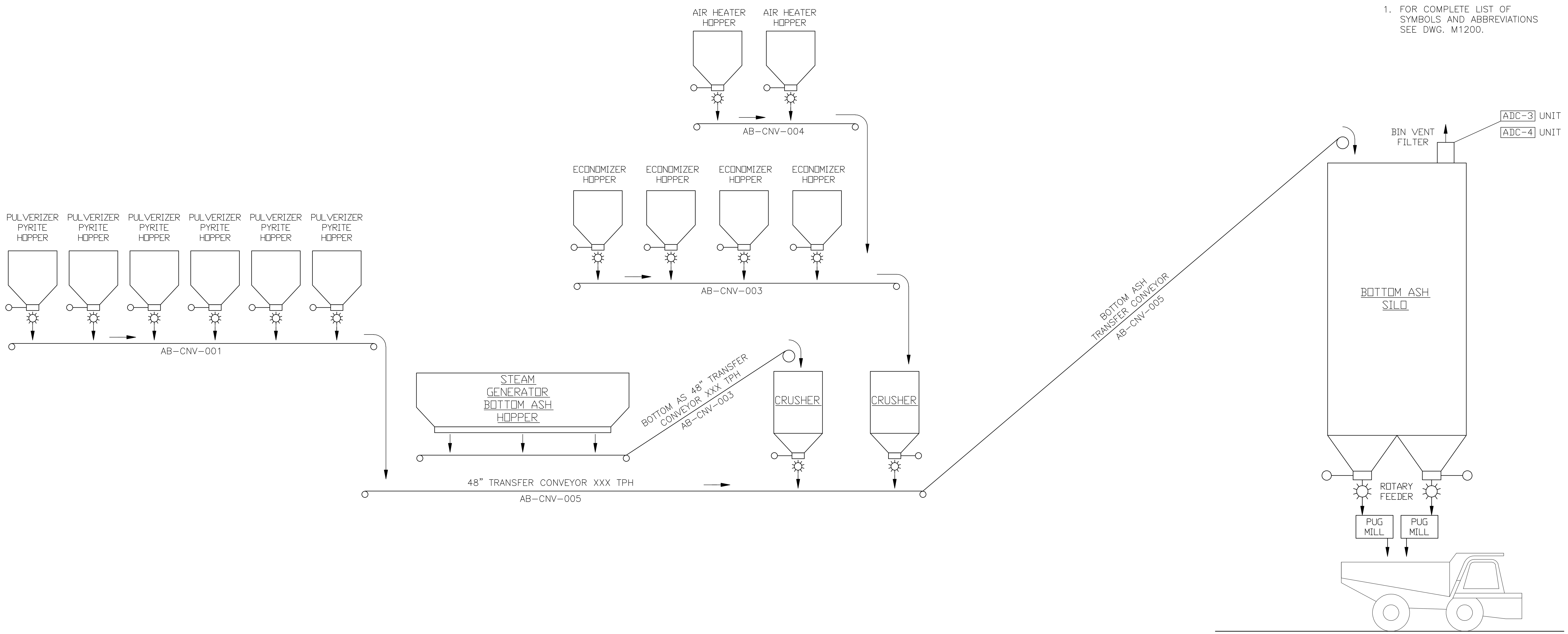
DWG. NO. 5486-1BA-M1152 | REV. C

DATE: 04-13-2007 TIME: 08:57 SCALE: 1:1 USER: mir NAME: J:\5486\9_Drawings\M5486-1BA-M1152.DWG

DWG. NO. 5486-1AB-M1160

NOTES:

1. FOR COMPLETE LIST OF SYMBOLS AND ABBREVIATIONS SEE DWG. M1200.



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C	04/13/07	INCORPORATED COMMENTS	MJR			
B	04/03/07	INCORPORATE COMMENTS	NSG			
A	03/09/07	INITIAL ISSUE	ELT			

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FLOW DIAGRAM
BOTTOM ASH HANDLING

NOT TO BE USED FOR CONSTRUCTION

SCALE: NONE	PROJECT NO. 5486
DWG. NO. 5486-1AB-M1160	REV. D

DATE: 06-13-2007 TIME: 15:17 SCALE: 1:1 J:\5486\9_Drawings\M5486-1AB-M1160.dwg

DWG. NO. 5486-CCH-M1156

COAL CRUSHER BUILDING

COAL CRUSHER BUILDING DUST COLLECTOR CH-DC-005

MDC-4

PLANT COAL TRANSFER TOWER #2

MAGNETIC SEPARATORS

66" RECLAIM COAL CONVEYOR 2,600 TPH
CH-CNV-004

FROM COAL STORAGE DOMES
SEE SHEET M1155

66" RESERVE RECLAIM COAL CONVEYOR 2,600 TPH
CH-CNV-005

FROM RESERVE RECLAIM COAL PILE
SEE SHEET M1155

48" COAL TRANSFER CONVEYORS 1,300 TPH
CH-CNV-006A

48" COAL RANSFER CONVEYORS 1,300 TPH
CH-CNV-006B

5486-CCH-M1155

FROM RECLAIM HOPPER AND BELT FEEDERS

MDC-3

TRANSFER TOWER #2 & RESERVE RECLAIM COAL DUST COLLECTOR CH-DC-004

200 TON CRUSHER SURGE HOPPER

COAL BELT FEEDERS 1,300 TPH

COAL CRUSHER 1,300 TPH (RING GRANULATORS W/ BY-PASS)

PLANT COAL TRANSFER TOWER #3

BELT SCALE

48" PLANT COAL FEED CONVEYOR 1,300 TPH
CH-CNV-007A

48" PLANT COAL FEED CONVEYOR 1,300 TPH
CH-CNV-007B

BELT SCALE

AS FIRED SAMPLING SYSTEM

MDC-5

TT#3 DUST COLLECTOR CH-DC-006

200 TON PLANT SURGE HOPPER

BELT FEEDERS 1,300 TPH

54" TRIPPER CONVEYOR 1,300 TPH
CH-CNV-008A

54" TRIPPER CONVEYOR 1,300 TPH
CH-CNV-008B

BELT SCALE

BELT SCALE

UNIT 1 COAL SILOS

UNIT 1 DUST COLLECTOR 1CH-DC-007

CDC-3

UNIT 2 COAL SILOS

UNIT 2 DUST COLLECTOR 2CH-DC-007

CDC-4

REV	DATE	DESCRIPTION	DWN	ENGR	CHK	APPV
D	06/25/07	INCORPORATE COMMENTS	ELT			
C	04/13/07	INCORPORATE COMMENTS	NSG			
B	03/23/07	INCORPORATE COMMENTS	NSG			
A	03/09/07	INITIAL ISSUE	NSG			

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FLOW DIAGRAM COAL HANDLING RECLAIM & TRANSFER

SCALE: NONE | PROJECT NO. 5486

DWG. NO. 5486-CCH-M1156 | REV. D

DWG: I:\5486\9 Drawings\W5486-CCH-M1156.dwg
USER: mjr
SCALE: 1:1
TIME: 08:11
DATE: 04-13-2007

DWG. NO. 5486-CCH-M1155

CAR DUMPER
DUST COLLECTOR
CH-DC-001

MDC-1

COAL UNLOADING BUILDING

ROTARY CAR DUMPER

GRADE

TRACK HOPPER

TRAIN POSITIONER

CH-1

72" COAL UNLOADING
CONVEYOR 4,000 TPH
CH-CNV-001

BELT FEEDER
4,000 TPH

BELT
SCALE

AS RECEIVED
SAMPLING SYSTEM

TRANSFER
TOWER #1

MAGNETIC
SEPARATOR

MDC-2

TT#1 &
RECLAIM DUST
COLLECTOR
CH-DC-002

72" COAL STOCKOUT CONVEYOR 4,000 TPH
CH-CNV-002

CH-2

COAL STORAGE DOME #2
40,000 TONS

72" DOME 2
FILL CONVEYOR
4,000 TPH
CH-CNV-003B

72" DOME 1
FILL CONVEYOR
4,000 TPH
CH-CNV-003A

COAL STORAGE DOME #1
40,000 TONS

CDC-2

CDC-1

STACKER

STACKER

RECLAIM

RECLAIM

DOME #2 DUST
COLLECTOR
CH-DC-003B

DOME #1 DUST
COLLECTOR
CH-DC-003A

RESERVE STOCKOUT
RADIAL STACKER
CH-CNV-009

TELESCOPING
SPOUT

STACKOUT PILE
54,000 TONS

GRADE

66" RECLAIM COAL CONVEYOR 2,600 TPH
CH-CNV-004

BELT
SCALE

BELT
SCALE

TO TRANSFER
TOWER #2
SEE SHEET M1156

RECLAIM HOPPERS
AND BELT FEEDERS
1,300 TPH (EACH)

CH-CNV-005
TO TRANSFER
TOWER #2
SEE SHEET
M1156

BELT
SCALE

5486-CCH-1556

TO TRANSFER TOWER #2 & RECLAIM
DUST COLLECTOR CH-DC-004

REV	DATE	DESCRIPTION	DWN	ENGR	CHK	APPV
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C	04/13/07	INCORPORATE COMMENTS	NSG			
B	03/23/07	PER COMMENTS	NSG			
A	03/09/07	INITIAL ISSUE	NSG			

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FLOW DIAGRAM
COAL HANDLING
UNLOADING & STORAGE

SCALE: NONE

PROJECT NO. 5486

DWG. NO. 5486-CCH-M1155

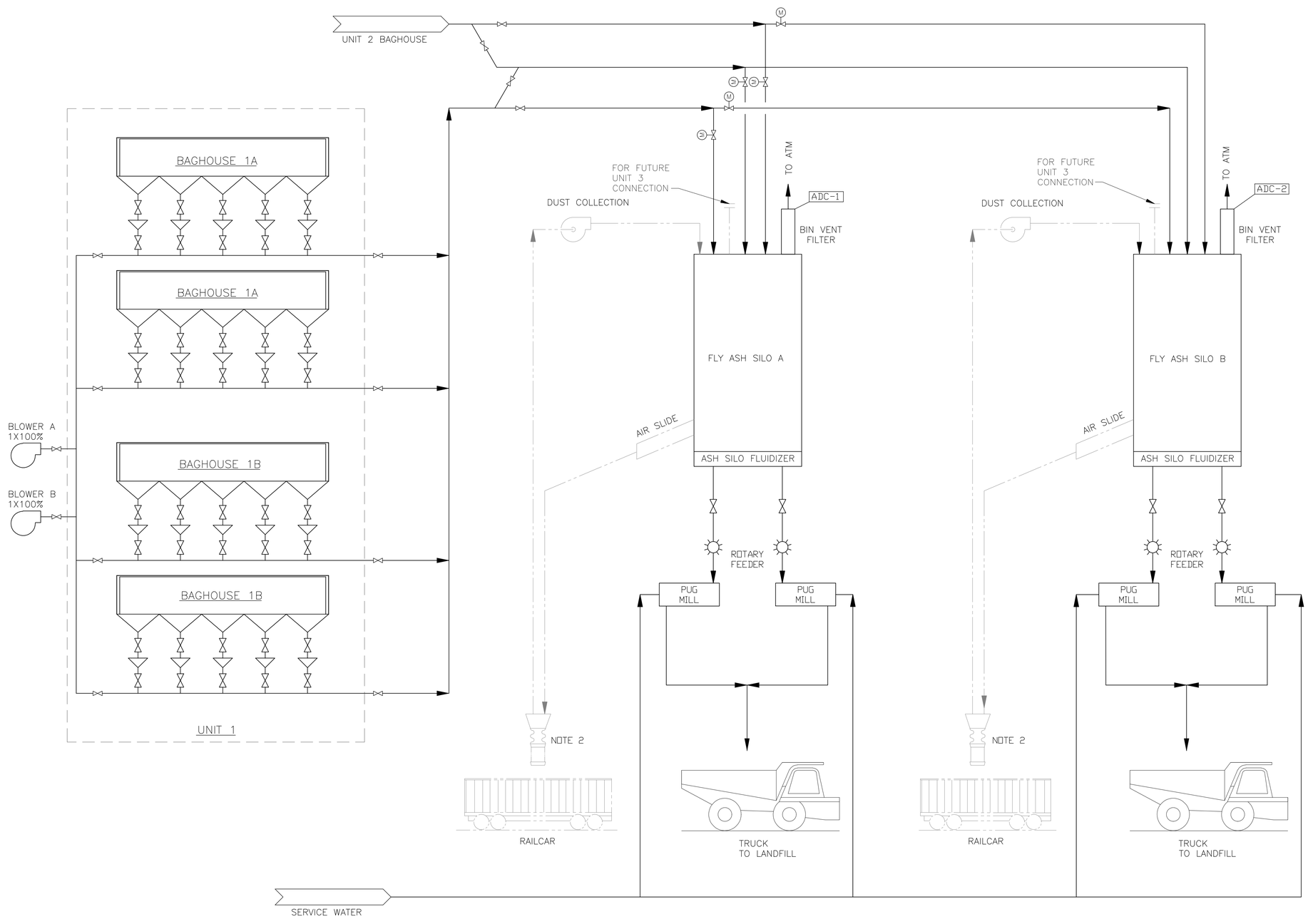
REV. D

DATE: 06-13-2007 TIME: 16:13 SCALE: 1:1 USER: matthew.dagenais\5486\9_Drawings\M5486-CCH-M1155.dwg

DWG. NO. 5486-CFA-M1161

NOTES:

1. FOR COMPLETE LIST OF SYMBOLS AND ABBREVIATIONS SEE DWG. M1200.
2. DRY UNLOADING TO BE INSTALLED IN THE FUTURE.



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B	03/15/07	INCORPORATE COMMENTS	NSG			
A	03/09/07	INITIAL ISSUE	ELT			

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FLOW DIAGRAM
FLY ASH HANDLING

SCALE: NONE | PROJECT NO. 5486

DWG. NO. 5486-CFA-M1161 | REV. E

NOT TO BE USED FOR CONSTRUCTION

DATE: 04-13-2007 TIME: 08:20 SCALE: 1:1 USER: mjr NAME: J:\5486\9_Drawings\M5486-CFA-M1161.dwg

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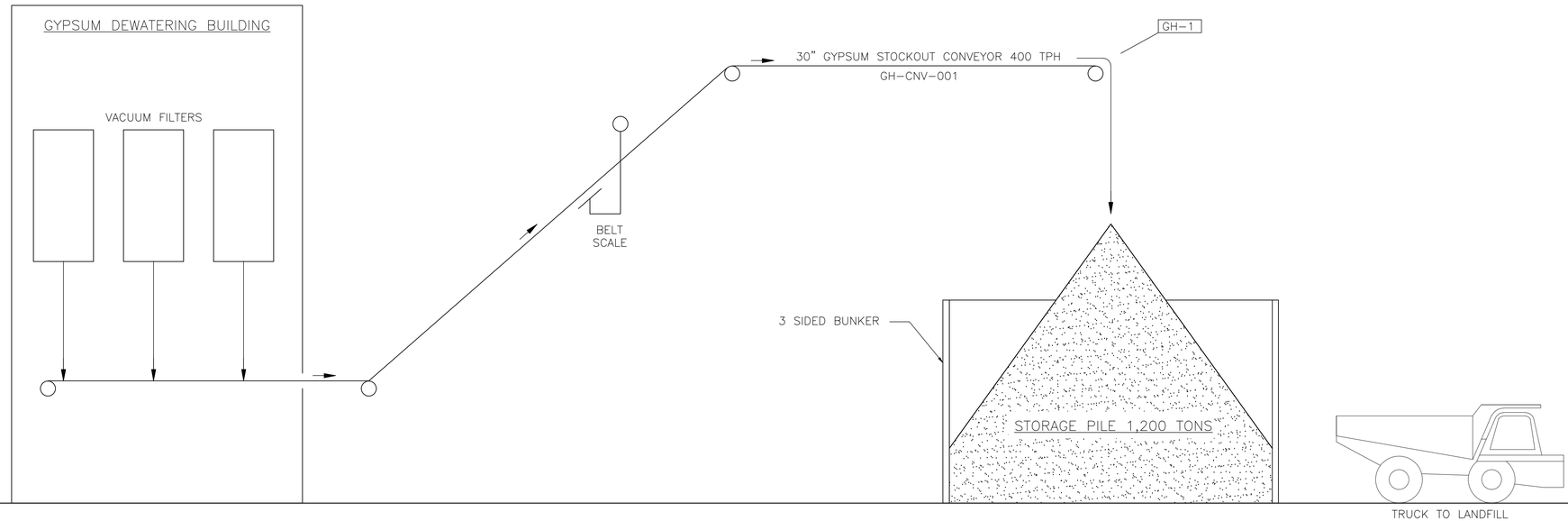

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B	04/13/07	INCORPORATE COMMENTS	NSG	.	.	.
A	03/09/07	INITIAL ISSUE	NSG	.	.	.

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FLOW DIAGRAM
GYPSUM HANDLING

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SCALE: NONE | PROJECT NO. 5486
DWG. NO. 5486-CGH-M1159 | REV. C

DATE 04-13-2007 TIME 08:15 SCALE 1:1 USER mjr NAME j:\5486\9 Drawings\M5486-CGH-M1159.dwg

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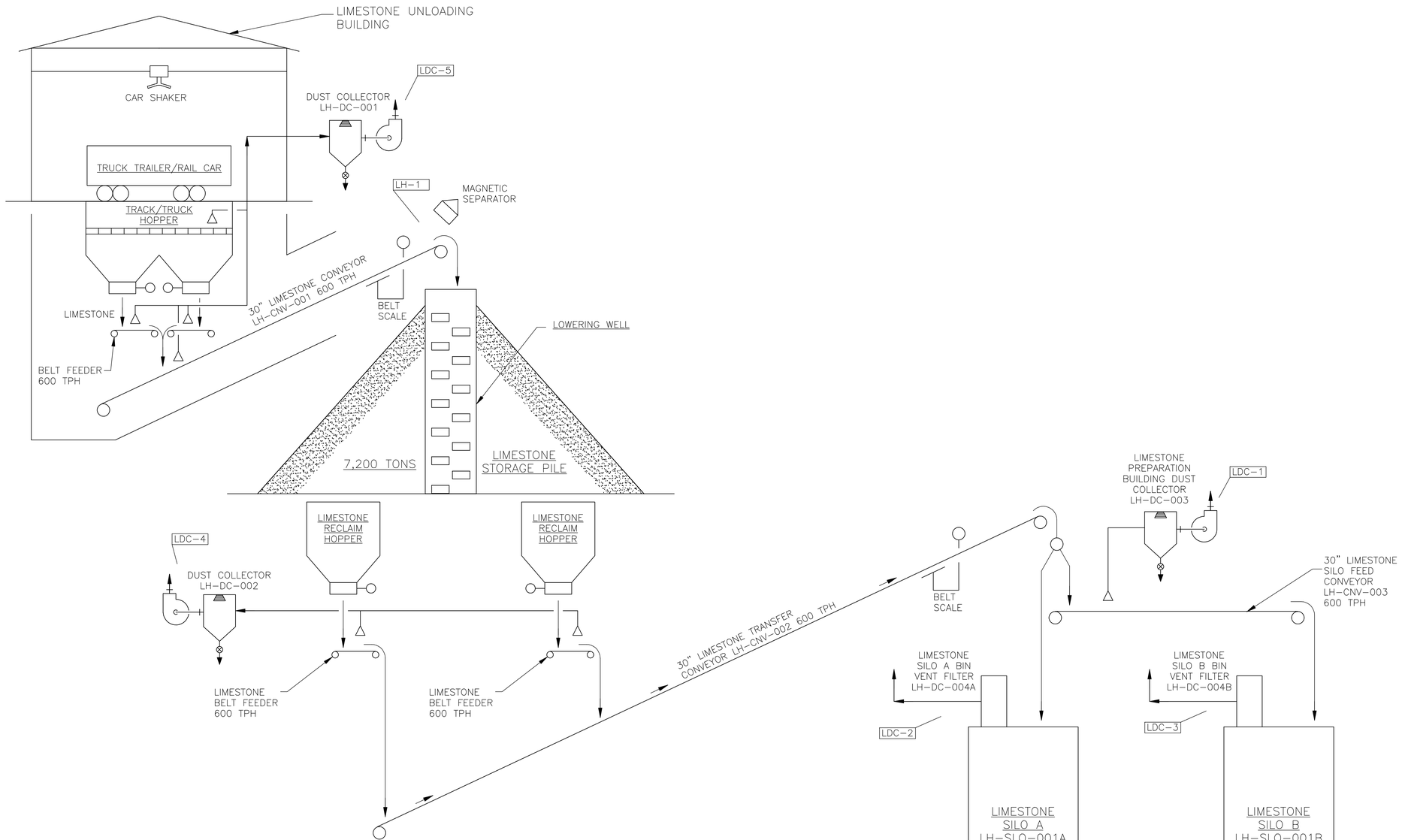

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B	03/15/07	INCORPORATE COMMENTS	NSG			
A	03/09/07	INITIAL ISSUE	NSG			

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FLOW DIAGRAM LIMESTONE HANDLING

SCALE: NONE | PROJECT NO. 5486

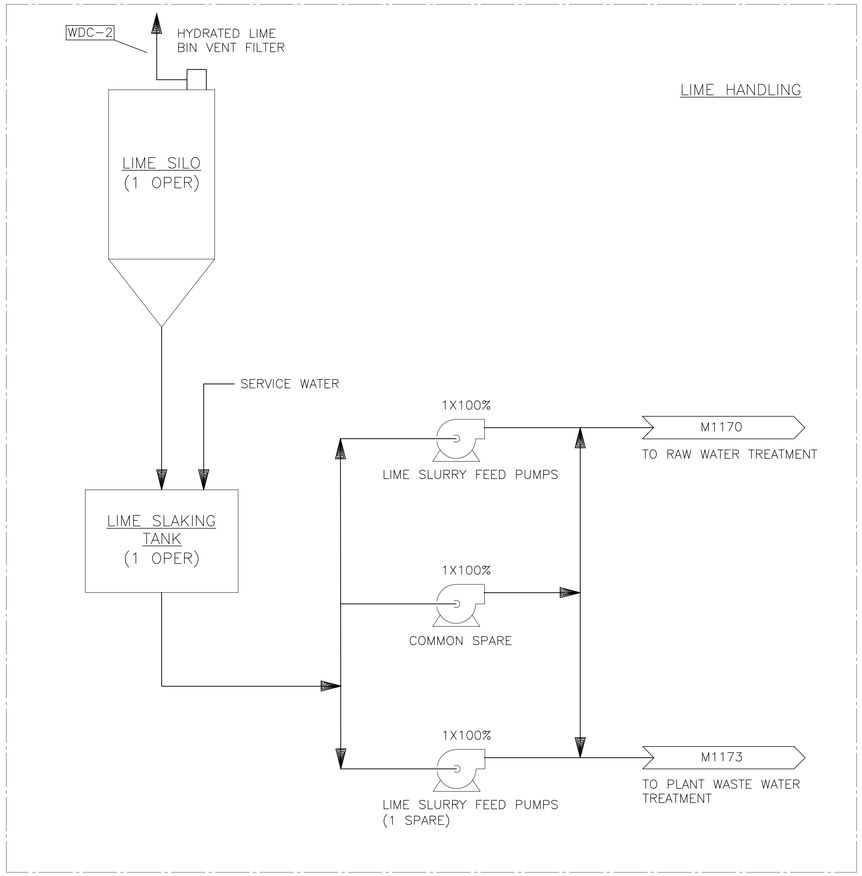
DWG. NO. 5486-CLH-M1158 | REV. D

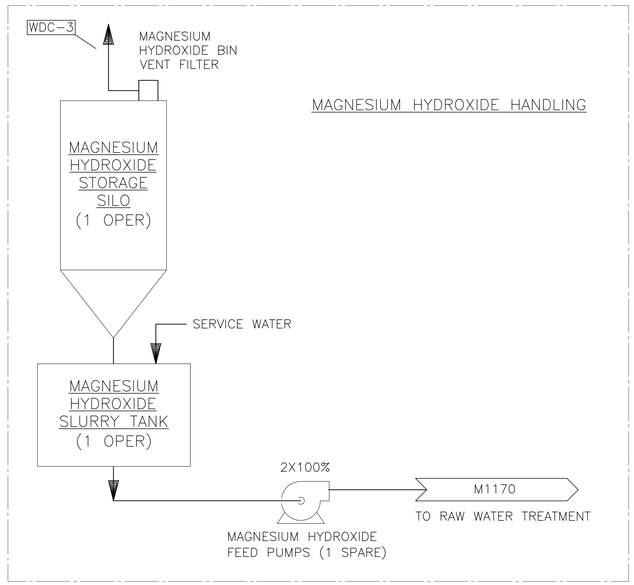
DATE: 04-13-2007 TIME: 08:14 SCALE: 1:1 USER: mjr NAME: J:\5486\9_Drawings\M5486-CLH-M1158.dwg

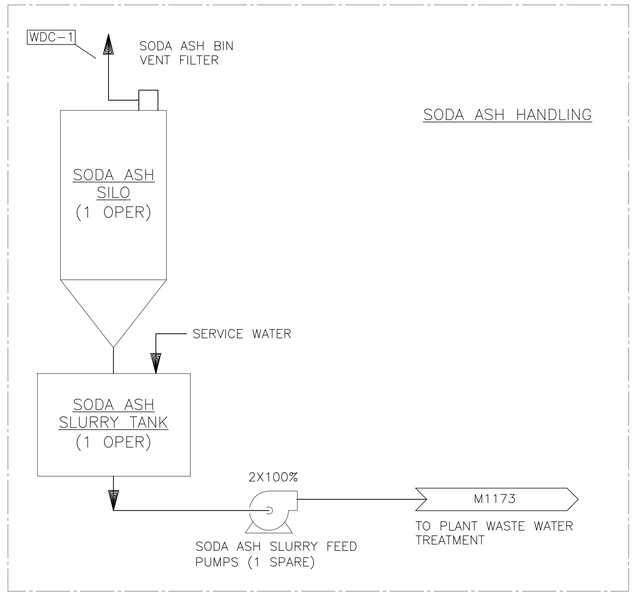
DWG. NO. 5486-CWT-M1174

NOTES:

1. FOR COMPLETE LIST OF SYMBOLS SEE DRAWING 5486-1AA-M1200







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A	06/18/07	INITIAL ISSUE	ELT			

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ELY ENERGY CENTER
PROCESS FLOW DIAGRAM
SODA ASH, LIME AND MAGESIUM HYDROXIDE HANDLING SYSTEMS

NOT TO BE USED FOR CONSTRUCTION

SCALE: NONE	PROJECT NO. 5486
DWG. NO. 5486-CWT-M1174	REV. B

DATE 06-25-2007 TIME 10:33 SCALE 1:1 USER matthew.ammon\\5486\9 Drawings\M5486-CWT-M1174.dwg

Ely Energy Center

SIERRA PACIFIC RESOURCES

DUST CONTROL PLAN

APPENDIX A8

Prepared for:

SIERRA PACIFIC RESOURCES
6226 WEST SAHARA AVENUE
LAS VEGAS, NEVADA 89146

Submitted to:

STATE OF NEVADA
NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR POLLUTION CONTROL
901 SOUTH STEWART STREET, SUITE 4001
CARSON CITY, NV 89701-5249

Prepared by:

TETRA TECH EM INC.
RENO, NEVADA 89502
(775) 322-0555

June 2007

CONTENTS

1.0 INTRODUCTION

This dust control plan describes measures to be taken by Sierra Pacific Resources (SPR), which consists of both the Nevada Power Company and Sierra Pacific Power Company, and its Contractors to ensure that dust control measures are implemented and maintained in accordance with federal, state, and local regulations during construction and operation of the Ely Energy Center (EEC) facility. This plan was developed in compliance with the conditions identified in the Nevada Division of Environmental Protection (NDEP) document, "Surface Area Disturbance Permit, Dust Control Plan (Plan) Preparation Guidelines" (NDEP 2002).

This dust control plan presents contact and location information (Section 2.0) and discusses enforcement (Section 3.0), environmental training (Section 4.0), the daily operation log (Section 5.0), and dust control measures (Section 6.0). References used to prepare this plan are listed in Section 7.0. The project description and schedule, plan objectives, and responsibilities are described below.

1.1 PROJECT DESCRIPTION AND SCHEDULE

SPR is proposing to build a new power generation plant, the EEC, near Ely, Nevada, in White Pine County. The Sierra Pacific Power Company and Nevada Power Company will own and jointly operate the EEC. The EEC is a vital part of SPR's integrated resource plan for supplying electric power to meet Nevada's growing electrical demand. The proposed EEC will consist of a two-unit, pulverized coal-fired (PC) plant. The EEC will use a supercritical cycle and be designed to fire western sub-bituminous coal. Each unit will be rated at 750 megawatts (MW) nominal generating capacity and share a common stack. Ancillary plant equipment will include fuel and waste preparation and handling equipment; fuel and waste loading/unloading, transfer, and storage facilities; a distillate oil-fired auxiliary boiler; fire protection equipment; and auxiliary generators. All control equipment has been selected from a best available control technology (BACT) analysis. The EEC will be equipped with a continuous emissions monitoring system (CEMS) that will monitor and record pollutants as required under federal and state regulations.

The EEC plant and associated features will be located in White Pine County on approximately 2,599 acres. The EEC site is in the center of the Steptoe Valley about 30 miles north of Ely and approximately 6 miles east of the base of the Egan Range on the west side of Highway 93. The EEC will be located primarily in Sections 16, 17, 20 and 21 of Township 19 North, Range 64 East at about the following Universal Transverse Mercator (UTM) coordinates: 690,108 meters east and 4,374,813 meters north (Zone 11, North American Datum [NAD] 83). The elevation of

the project site is approximately 6,200 feet above mean sea level. At this time, roads provide access to the EEC site location.

1.2 PLAN OBJECTIVES

The purpose of this plan is to provide the plant construction manager, Contractor, construction and environmental inspectors, and regulatory agencies with a description of measures to control fugitive dust associated with construction and operation of the EEC facility during pre-construction, construction, and operation. The management practices and activities in this plan are intended to accomplish the following:

- Minimize dust-related impacts
- Ensure that construction activities do not result in significant impacts to air quality

1.3 RESPONSIBILITIES

The SPR and Contractor will take all reasonable precautions to minimize airborne particulate matter from the EEC and will apply dust suppression measures as necessary throughout construction of the EEC. Dust control measures will be available for application as necessary 24 hours per day, 7 days a week, in project areas where significant dust generation becomes a safety or air quality issue. Dust control measures will be ongoing during construction hours to ensure that the EEC site is in compliance with this plan. The Contractor shall ensure that during construction, measures are taken to maintain compliance. Control measures are identified in Section 6.0 of this plan. The responsibilities of the Company (SPR) and Contractor are specified below.

1.3.1 The Company

The Company (SPR) will be responsible for the following:

- Obtaining a surface area disturbance (dust control) permit from NDEP for construction and operation of the EEC facility
- Ensuring that this plan is available on site throughout construction at the Company's field office
- Ensuring that a copy of this plan is maintained in the construction inspectors' and supervisors' vehicles and project files during the project
- Providing an environmental inspector to monitor performance and ensure compliance with this plan
- Ensuring that all project personnel understand the requirements for dust control described in this plan

Any changes to this plan will be submitted to NDEP in writing for approval prior to enacting the changes. Once construction is complete, the Company will notify NDEP.

The responsible official has read the provisions of *Nevada Administrative Code* (NAC) Section 445B.22037, "Emission of Particulate Matter, Fugitive Dust," and is aware that SPR is responsible for preventing controllable fugitive dust from the project area 24 hours a day, 7 days a week. The attachment to this dust control plan provides a copy of NAC Section 445B.22037.

1.3.2 The Contractor

The Contractor will be responsible for the following:

- Providing the necessary labor and equipment to implement the dust control measures identified in this plan
- Implementing additional dust control measures as required by NDEP
- Suspending certain construction activities that generate significant amounts of uncontrollable dust during high wind conditions (30 miles per hour [mph] or greater)

Construction is scheduled to begin in Summer 2008. The construction will be completed in phases, and the first boiler unit is scheduled for completion in 2011 and the second in 2013.

2.0 CONTACT AND LOCATION INFORMATION

RESPONSIBLE OFFICIAL:

Roberto R. Denis
Senior Vice President, Energy Supply
Nevada Power Company
6226 West Sahara Avenue
Las Vegas, Nevada 89146
Telephone No.: (702) 367-5662

PROJECT MANAGER:

Darrell Soyars
Sierra Pacific Power Company
6100 Neil Road
P.O. Box 10100
Reno, Nevada 89520-0024
Telephone No.: (775) 834-4744

LOCATION AND ADDRESS:

MAILING ADDRESS:
To Be Determined

PHYSICAL ADDRESS:
Ely Energy Center
Sections 16, 17, 20 and 21 of Township 19 North, Range 64 East (Hydrographic Basin 179)
UTM 690,108 meters east and 4,374,813 meters north
Zone 11, North American Datum 83
30 miles north of Ely, Nevada
West side of Highway 93 in the Steptoe Valley

ON-SITE MANAGER:

ON-SITE MANAGER:
To vary by day

ON-SITE FIELD OFFICE TELEPHONE:
To Be Determined

24-HOUR RESPONSE TELEPHONE:
To Be Determined

PROJECT LOCATION:

Ely Energy Center
Sections 16, 17, 20 and 21 of Township 19 North, Range 64 East (Hydrographic Basin 179)
UTM 690,108 meters east and 4,374,813 meters north
Zone 11, North American Datum 83
30 miles north of Ely, Nevada
West side of Highway 93 in the Steptoe Valley

3.0 ENFORCEMENT

This dust control plan and the EEC project site are subject to inspection by an NDEP investigator at any time. If the Contractor cannot provide satisfactory control of airborne particulates, additional precautions may be reasonably prescribed by the NDEP investigator consistent with NAC Section 445B and this plan. The NDEP investigator will consider wind and weather conditions, soil type, size of the project, equipment use, control requirements stated in this plan, good faith efforts by the Contractor, and conditions beyond the control of the Contractor.

During high wind conditions (30 mph or greater), SPR and the Contractor may be required to suspend certain construction activities that generate significant amounts of uncontrollable dust. The on-site managers (personnel will vary by day) for SPR and the Contractor are authorized to cease operations when conditions may prevent the control of fugitive dust. If during construction the NDEP investigator documents noncompliance with any provision contained in this plan, a written Notice of Violation may be issued that will specify a period of time in which the Contractor must satisfactorily achieve compliance with this plan. In all cases, the Contractor will take appropriate actions to achieve compliance within 24 hours.

4.0 ENVIRONMENTAL TRAINING

All personnel working on the project will attend an environmental training program that will include a discussion of the requirements of this dust control plan. The training will emphasize Contractor and Contractor personnel responsibilities and methods for controlling dust as described in this plan. A training log will be kept on site with the daily operation log.

5.0 DAILY OPERATION LOG

A daily operations log will be kept on site that lists the operation hours of construction equipment, i.e. such as scrapers, graders, front-end loaders, and water trucks. Additionally, the log will list the amount of water used, the number of water trucks used, and when operations begin and cease each day. The daily operation log will also indicate if operations cease because of wind or other meteorological conditions.

6.0 DUST CONTROL MEASURES

The SPR and the Contractor will control fugitive dust by watering or applying chemical dust suppressants to disturbed active construction areas as described in this plan. Additionally, active wet suppression or installation of a porous wind fence may be used as necessary to minimize fugitive dust in the event bulk materials require on-site storage for an extended period of time.

The SPR and the Contractor will take all reasonable precautions to prevent the generation of dust. Reasonable precautions may include one or more of the following:

- Using water to control dust on access roads and the construction area
- Using chemical dust palliatives on access roads
- Curtailing certain activities during periods of extremely high wind conditions
- Limiting vehicle speeds
- Installing a wind fence

The following sections discuss the use of the following to control dust: water trucks, dust palliatives, wind fences, vehicular travel limitations, landscape preservation and impact avoidance, material storage and handling, paved roads and paved road crossings, coal storage pile requirement, and ash landfill requirements.

6.1 WATER TRUCKS

The SPR and the Contractor will operate a minimum of two water trucks throughout the construction phase of the project as necessary. Water trucks will apply water as needed to control fugitive dust. The trucks will be available for operation as necessary 24 hours per day, 7 days a week, to control fugitive dust. If the water trucks cannot control fugitive dust, the SPR and the Contractor will provide additional water trucks or implement additional measures to control dust. The water supply for the water trucks will be from a construction well on the project site or pipeline delivery from an off-site source.

If winds exceed 30 mph and result in significant fugitive dust generation, additional reasonable efforts may be implemented, including shutting down mobile equipment or increasing the right-of-way watering efforts in a manner that adequately controls fugitive dust generation. If operations are shut down as the control method, the project area will continue to be watered. During winter and at any time that there is sufficient moisture due to weather conditions to defer the need for dust suppression, no dust control will be required.

6.2 DUST PALLIATIVES

Dust control during construction will be achieved primarily through application of water or an approved dust palliative, such as calcium chloride, magnesium chloride, lignosulfonate, or some other effective suppressant. All dust palliatives used will be environmentally safe; comply with federal, state, and local regulations; and not result in a noxious odor or contaminate surface water or groundwater. If a dust palliative other than calcium chloride, magnesium chloride, or lignosulfonate is used, the Contractor will obtain prior approval from the Company, the Bureau of Land Management, and NDEP. Application rates for dust palliatives will follow the manufacturer's recommendations.

6.3 WIND FENCES

In the event bulk materials require on-site storage for an extended period of time, the Contractor may install a porous wind fence to minimize fugitive dust.

6.4 VEHICULAR TRAVEL LIMITATIONS

The speed limit for all vehicles will be limited to 15 mph in the construction areas and on unpaved access roads. Paved roads will have posted speed limits. Additionally, travel off of access roads will be restricted. Off-highway vehicle travel on roads established for use during construction or in adjacent areas will be discouraged by the placement of signs along the access road.

6.5 LANDSCAPE PRESERVATION AND IMPACT AVOIDANCE

Vegetation in the project area will be preserved and protected to the extent possible to maintain ground cover and minimize dust generation. Vegetation clearing will be restricted to the area needed for construction. Final site grading and restoration will be initiated as particular areas are no longer needed for construction, stockpiling, or access. Treading on areas not immediately involved in project construction activities will be avoided to reduce potential wind erosion and fugitive dust generation.

6.6 MATERIALS STORAGE AND HANDLING REQUIREMENTS

The SPR and the Contractor will not handle or store any material in a manner that results in excessive dust generation. Topsoil and subsoil storage piles maintained as a part of this construction project will be sufficiently wetted down to reduce wind-blown dust. Wetting may involve the use of a light soil tackifier or adequate wetting of the soil pile surface to produce a crust less prone to wind erosion. Screening will be conducted to ensure that dust emissions are controlled through the use of a water truck during less windy periods, and by other suitable control measures.

The control measures summarized below will be used on any vehicle operating on a roadway with a load of soil, sand, gravel, or other material susceptible to being dropped, spilled, or leaked, or that generates dust.

- Keep the materials sufficiently damp to control dust emissions during transportation.
- If necessary, the Company and the Contractor will use tarps or similar cargo covers to prevent the generation of airborne dust and to keep material from escaping.
- During truck unloading the drop height and fugitive emissions will be controlled as required.

6.7 ROADS AND ROAD CROSSINGS

As necessary and only if approved and permitted, the access road to the site may be paved to prevent fugitive dust. Access roads that remain unpaved will be covered with gravel and/or watered as necessary to minimize dust generation. Any time the weather is dry enough to cause the formation of dust, the water truck will water the project site roads sufficiently to control fugitive dust. A semi-permanent compound (such as magnesium chloride) may be applied to unpaved roads to minimize fugitive dust from traffic. At paved road crossings, if applicable, the Contractor may install a rock access pad on both sides of the road to reduce the amount of soil tracked onto roadways.

In addition, any soil that is tracked onto adjoining paved roadways will be promptly swept or washed off the road surface as quickly as safety concerns allow. The Contractor will not wash mud or soil off the road into storm drain facilities unless adequate inlet sediment controls are in place. NDEP may require the Company and the Contractor to employ additional cleaning techniques to reduce tracking of soil or other materials onto paved surfaces.

6.8 COAL STORAGE PILE REQUIREMENT

Coal storage pile dust suppression will be available when fugitive dust control is required.

6.9 ASH LANDFILL REQUIREMENTS

In active landfill areas, dust suppression will be available when fugitive dust control is required. Landfill reclamation will be completed in conformance with the landfill permit to control fugitive dust.

7.0 REFERENCES

Nevada Division of Environmental Protection (NDEP). 2002. "Surface Area Disturbance Permit, Dust Control Plan (Plan) Preparation Guidelines." Bureau of Air Pollution Control, Carson City, Nevada. October 15.

ATTACHMENT

NAC SECTION 445B.22037 REGULATORY GUIDANCE

NAC 445B.22037 Emissions of particulate matter: Fugitive dust.

1. No person may cause or permit the handling, transporting or storing of any material in a manner which allows or may allow controllable particulate matter to become airborne.

2. Except as otherwise provided in subsection 4, no person may cause or permit the construction, repair, demolition, or use of unpaved or untreated areas without first putting into effect an ongoing program using the best practical methods to prevent particulate matter from becoming airborne. As used in this subsection, "best practical methods" includes, but is not limited to, paving, chemical stabilization, watering, phased construction and revegetation.

3. Except as otherwise provided in subsection 4, no person may disturb or cover 5 acres or more of land or its topsoil until he has obtained an operating permit for surface area disturbance to clear, excavate, or level the land or to deposit any foreign material to fill or cover the land.

4. The provisions of subsections 2 and 3 do not apply to:
   (a) Agricultural activities occurring on agricultural land; or
   (b) Surface disturbances authorized by a permit issued pursuant to NRS 519A.180 which occur on land which is not less than 5 acres or more than 20 acres.

[Environmental Comm'n, Air Quality Reg. §§ 7.3.1 & 7.3.2, eff. 11-7-75; § 7.3.3, eff. 11-7-75; A 12-15-77]—(NAC A 9-19-90; 12-26-91; 12-13-93; 10-30-95)—(Substituted in revision for NAC 445B.365)